

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 APR 29 P 12:36

U.S. DISTRICT COURT
DISTRICT OF MASS.

JOCELYN GEORGES,)
)
)
Plaintiff,)
)
)
v.)
)
PARTNERS HEALTHCARE)
SYSTEM, INC., a/k/a)
MASSACHUSETTS GENERAL)
HOSPITAL,)
)
Defendants.)

C.A. No. 03-12553-REK

PARTIES' JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to the Notice of Scheduling Conference dated April 5, 2004 and L.R.D.Mass. 16.1, Plaintiff Jocelyn Georges and Defendant Massachusetts General Hospital ("the Parties") respectfully submits the following:

I. Proposed Discovery Schedule

- A. The Parties anticipates complying with their disclosure obligations pursuant to Fed.R.Civ.P. 26(a)(1) prior to the conference on May 6, 2004.
- B. The Parties believe four months, to September 7, 2004, will be sufficient time to complete fact discovery.
- C. The Parties do not anticipate expert discovery, and therefore sees no basis for phased discovery.

II. Motion Schedule

The Defendant Massachusetts General Hospital anticipates filing a motion for summary judgment on or before October 8, 2004.

III. Certification

Filed independently by the Parties.

JOCELYN GEORGES

By his attorney,

John D. Corrigan (Cnr)
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PARTNERS HEALTHCARE SYSTEM, INC., a/k/a
MASSACHUSETTS GENERAL HOSPITAL

By their attorneys,

Christine M. Roach
Christine M. Roach – BBO No. 421630
ROACH & CARPENTER, P.C.
24 School Street
Boston, MA 02108
(617) 720-1800

DATED: April 29, 2004

Certificate of Service

I, Christine M. Roach, hereby certify that I have served a copy of the above pleading on the opposing party by this day mailing a copy of same regular mail to counsel of record.

DATED: April 29, 2004

Christine M. Roach
Christine M. Roach

Christine M. Roach
M. Ellen Carpenter

Scott P. Lopez
of Counsel



ROACH & CARPENTER, PC

FEDERAL COURTS
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DISTRICT OF MASSACHUSETTS

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BY HAND

April 29, 2004

Karen Folan, Docket Clerk
Hon. Robert E. Keeton
United States District Court
District of Massachusetts
John Joseph Moakley Federal Courthouse
1 Courthouse Way
Boston, MA 02210

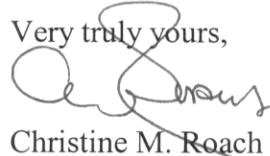
RE: Georges v. Partners HealthCare System, Inc., et al.
Civil Action No. 03-12553-REK

Dear Ms. Folan:

Enclosed for filing in the above matter, please find the following:

- Parties' Joint Statement Pursuant to Local Rule 16.1(D); and
- Defendant's Certification Pursuant to Fed.R.Civ.P. 16(D)(3).

Thank you for your attention to this matter.

Very truly yours,

Christine M. Roach

encl.

cc: John D. Corrigan, Esq. (via regular mail, w/encl.)